

# Exhibit 31

1 UNITED STATES DISTRICT COURT

2 EASTERN DISTRICT OF NEW YORK

3 Action No: 05cv4622(DGT)(MDG)

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5 TZVI WEISS, et al,  
6 Plaintiffs,

7 against

8 NATIONAL WESTMINSTER BANK, PLC.,  
9 Defendant.

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11 NATAN APPLEBAUM, et al.,  
12 Plaintiffs,

13 against

14 NATIONAL WESTMINSTER BANK, PLC.,  
15 Defendant.

16 VIDEOTAPED DEPOSITION OF AMANDA HOLT

17 Friday 23 July 2010

18 At: 10:00 am

19 Taken at:

20 Cleary, Gottlieb, Steen & Hamilton LLP  
21 55 Basinghall Street, London  
22 United Kingdom

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1 Gossage, the Head of Group Risk. I genuinely cannot  
2 remember exactly when, but in 2002.

3 Q. And did Mr. Swanney pass over with that  
4 function?

5 A. No, he didn't. The function passed over  
6 but David Swanney I think left the bank at the time.

7 Q. Okay, and whenever that function arrived  
8 in -- did it arrive in Group Enterprise Risk?

9 A. No, it arrived in Group Risk.

10 Q. So that was not under your -- that was not  
11 part of your remit?

12 A. Group Compliance was split, I was given  
13 responsibility for ensuring that the Know Your Customer  
14 requirements were being met, and then subsequently the  
15 responsibility for Money Laundering Prevention and  
16 Sanctions in Terrorist Financing was formally passed  
17 over to Enterprise Risk later on in 2002. The rest of  
18 Compliance, which was renamed Group Regulatory Risk, was  
19 passed over to be under Richard Gossage, and there was  
20 a new Head of Regulatory Risk recruited.

21 Q. Do you recall who that was?

22 A. Stephen Sanders.

23 Q. When you started at RBS, in early 2002,  
24 was Stephen Foster one of the people who reported to  
25 you?

1 A. No, he was not.

2 Q. Did you hire him at some point?

3 A. I hired him, yes.

4 Q. Do you recall when that was?

5 A. Again, that was in 2002. It was when

6 I acquired responsibility for Money Laundering

7 Prevention and Sanctions in Terrorist Financing.

8 Q. And what were Mr. Foster's duties and  
9 responsibilities?

10 A. I don't recall the detail. There would  
11 have been a detailed job spec, but his title was Head of  
12 Group Anti-money Laundering.

13 Q. And do you recall anybody else who  
14 reported to you in or around late 2002, in Group  
15 Enterprise Risk?

16 A. Just for clarity, is that with  
17 responsibility for Anti-money Laundering and Financial  
18 Crime or across the board?

19 Q. Let start just with responsibility for  
20 Anti-money Laundering and Financial Crime?

21 A. Stephen Foster had responsibility for  
22 Anti-money Laundering and Financial Crime. There was  
23 a separate project going on I think. Towards the end of  
24 2002 and 2003, the Joint Money Laundering Steering  
25 Group, which is a regulatory body which has members